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9 *Company, Disney Media and Entertainment*
10 *Distribution LLC, Disney DTC LLC, Disney*
11 *Streaming Services LLC, Disney Entertainment &*
12 *Sports LLC, Disney Platform Distribution, Inc.,*
13 *BAMTech LLC, Hulu, LLC, and ESPN, Inc.*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION AT LOS ANGELES**

14 INTERDIGITAL INC.,
15 INTERDIGITAL VC HOLDINGS,
16 INC., INTERDIGITAL MADISON
17 PATENT HOLDINGS, SAS, AND
18 INTERDIGITAL CE PATENT
19 HOLDINGS, SAS,

20 Plaintiffs and
21 Counterclaim-
22 Defendants,

23 v.

24 THE WALT DISNEY COMPANY,
25 DISNEY MEDIA AND
26 ENTERTAINMENT DISTRIBUTION
27 LLC, DISNEY DTC LLC, DISNEY
28 STREAMING SERVICES LLC,
DISNEY ENTERTAINMENT &
SPORTS LLC, DISNEY PLATFORM
DISTRIBUTION, INC., BAMTECH,
LLC, HULU, LLC, AND ESPN, INC.,

Defendants and
Counterclaim-
Plaintiffs.

Case No. 2:25-cv-895-WLH-BFM

**DEFENDANTS' NOTICE OF
MOTION FOR A PRELIMINARY
INJUNCTION RELATED TO
INTERDIGITAL'S REQUEST
FOR INJUNCTION IN BRAZIL**

Judge: Hon. Wesley L. Hsu
Magistrate: Hon. Brianna F. Mircheff
Hearing: May 30, 2025 at 1:30pm

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT at 1:30 p.m. on May 30, 2025, in the courtroom of the Honorable Wesley L. Hsu located at the First Street Courthouse, 350 West 1st Street, Los Angeles, CA 90012, in Courtroom 9B, Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc. (collectively, “Defendants”) will move for an order for a preliminary injunction, pursuant to Fed. R. Civ. P. 65 and C.D. Cal., Local Civ. Rule 65-1, restraining and enjoining Plaintiffs InterDigital Inc., InterDigital VC Holdings, Inc., InterDigital Madison Patent Holdings, SAS, and InterDigital CE Patent Holdings, SAS (collectively, “InterDigital”) from enforcing any injunction awarded to it in the simultaneous Brazilian proceedings against Defendants until this Court resolves Defendants’ breach of RAND licensing counterclaims in this action, including their First, Second, Third, and Fourth Counterclaims (Dkt. 42 at 99-103).

This motion will be made on the grounds that immediate and irreparable injury will result to Defendants unless InterDigital is so enjoined during the pendency of this action, and will be based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, and the declarations of Ryan Yagura, Paula Beck,¹ Timothy Lee, Scott Labrozzi, Natalia Barzilai, and Ketan Mayer-Patel.

¹ Portions of the Declarations of Paula Beck and Scott Labrozzi, one exhibit to the Declaration of Timothy Lee, and the portions of Defendants’ Memorandum that rely on the information therein have been redacted to protect Defendants’ confidential and commercially sensitive information. Defendants concurrently file an application for leave to file the unredacted versions of these documents under seal pursuant to Local Rule 79-5.

1 DATED: April 24, 2025

Respectfully submitted,

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3 By: /s/ Ryan K. Yagura
4 Ryan K. Yagura

5 RYAN K. YAGURA
6 NICHOLAS J. WHILT
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10 *Entertainment Distribution LLC, Disney*
11 *DTC LLC, Disney Streaming Services LLC,*
12 *Disney Entertainment & Sports LLC,*
13 *Disney Platform Distribution, Inc.,*
14 *BAMTech LLC, Hulu, LLC, and ESPN, Inc.*
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